

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

Barry D. Leiwant  
*Interim Executive Director  
and Attorney-in-Chief*

**MEMO ENDORSED**

*Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge*

December 21, 2023

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 12/21/2023

**By ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Jonathan Carbuccia  
23 Cr. 551 (VEC)**

Dear Judge Caproni,

I write to request two temporary bail modifications that would enable Mr. Carbuccia to spend the upcoming holidays with his family. Mr. Carbuccia has been out on bail since his presentment on July 25, 2023; his conditions include a curfew enforced by GPS location monitoring. Dkt. Nos. 5, 13.

First, we seek permission for Mr. Carbuccia to spend the night of December 24, 2023 at his cousin's house, with the rest of his family members, in Poughquag, NY (Dutchess County). The exact name and address of the cousin have been provided to Officer Marlon Ovalles at Pretrial Services. Pretrial Services informed undersigned counsel that it opposes overnight travel for people on curfew with location monitoring, but Officer Ovalles also confirms that Mr. Carbuccia remains in compliance with the conditions of his release.

Second, we seek to extend Mr. Carbuccia's curfew to 2 a.m. on January 1, 2024, so that he can attend a New Year's dinner with his family. Pretrial Services has no objection to this request.

The government, by Assistant United States Attorney Will Kinder, has no objection to these requests.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine  
Attorney for Jonathan Carbuccia  
917-612-4527

Application GRANTED. Mr. Carbuccia may spend the night of December 24, 2023, at his cousin's house in Poughquag, NY. Mr. Carbuccia must also provide Pretrial Services with the phone number of his cousin or another family member with whom he will be staying.

Mr. Carbuccia's curfew is extended to 2:00 A.M. on January 1, 2024, so that he can attend a New Year's dinner with his family.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

12/21/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE